

October 27, 2015

Margaret M. Fox

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T 803.799.9800
F 803.753.3278

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Petition for Review of Numbering Resources Denial in the Fort Mill Rate Center

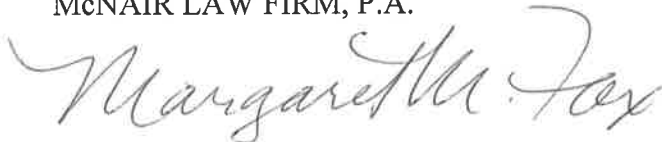
Dear Ms. Boyd:

Attached please find a Petition for Review of Numbering Resources Denial in the Fort Mill Rate Center, which is being filed on behalf of Fort Mill Telephone Company d/b/a Comporium Communications.

Thank you for your assistance. If you should have any questions, please do not hesitate to contact me.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:dmf

cc: Jeffrey M. Nelson, Esquire, ORS (w/enclosure)
Greg Lunsford, Comporium (w/enclosure)

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Columbia, SC 29201

Mailing Address
Post Office Box 11390
Columbia, SC 29211

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BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. _____

In Re:)
)
Petition of Fort Mill Telephone Company)
d/b/a Comporium Communications Requesting)
the Commission's Intervention in Numbering)
Resources Determinations)

PETITION FOR REVIEW OF NUMBERING RESOURCES DENIAL
IN THE FORT MILL RATE CENTER

Fort Mill Telephone Company d/b/a Comporium Communications ("Comporium"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging numbering determinations, petitions the Public Service Commission of South Carolina ("Commission") for review of the denial of Comporium's application for use of numbering resources in the 803 area code. Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), depending on the nature of the request. FCC rules and order allow for challenges of determinations by both entities. *See, e.g., 47 C.F.R. §52.15(g)(4).*

In support of this petition Comporium states:

1. Comporium is a telecommunications public utility regulated by the Commission. It provides intraLATA, local exchange telecommunications in the State of South Carolina and in the Fort Mill exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”). *See* 47 C.F.R. § 52.13 (a), (b).

3. The PA is the entity responsible for administering a thousands-block number pool. *See* 47 C.F.R. §52.7(g).

4. On March, 31, 2000, the FCC issued a Report and Order relating to numbering resource optimization (“*First NRO Order*”).¹ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers under the NANP.

5. Among other things, the *First NRO Order* adopted a revised standard for assessing a carrier’s need for numbering resources by requiring rate center based utilization rates to be reported to NANPA. The FCC further required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant’s rate center will be exhausted within six months of the application. *See* 47 C.F.R. § 52.15(g)(3)(B)(iii). This basis for determining the need for new numbering resources was intended to “more accurately reflect how numbering resources are assigned” and to allow “carriers to obtain numbering resources in response to specific customer demands.” *First NRO Order* at ¶ 105. The FCC reaffirmed this requirement in two subsequent orders.²

¹ Report and Order and Further Notice of Proposed Rulemaking, *Numbering Resources Optimization*, 15 FCC Rcd 7574, FCC 00-104 (rel. March 31, 2000) (“*First NRO Order*”) at ¶ 105.

² *See* Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306, FCC 00-429 (rel. December 29, 2000) (“*Second NRO Order*”) at ¶29; Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No.

6. In addition to the months-to-exhaust (“MTE”) requirement described above, the FCC’s rules also require carriers to meet a rate center utilization threshold in order to receive additional numbering resources in a given rate center. 47 C.F.R. § 52.15(h). The utilization threshold was initially 60%, but it has now increased to the maximum utilization threshold of 75%. *See id.* A carrier must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources. *See Third NRO Order* at ¶ 50.

7. On or about October 22, 2015, Comporium submitted a Pooling Administration System request for the assignment of two thousands-blocks in the Fort Mill exchange. The Application is attached hereto as Exhibit A. This request was made in order to meet the customer’s express request for numbers in the Fort Mill exchange. A copy of the customer’s request is attached as Exhibit B.

8. Comporium completed the application in accordance with Industry Numbering Committee (“INC”) Guidelines, and filled out the necessary Months to Exhaust Certification Worksheet as required.

8. The numbering request was for block 5000-5999 and block 8000-8999 in the 803-228 NPA-NXX. Comporium does not have sufficient numbering resources available within its inventory in the Fort Mill rate center to meet the customer’s specific request.

9. At the time of the filing of the request, the Fort Mill rate center had a MTE of between 150,069-161,497 and a utilization of 77.36 percent.

99-200, *Numbering Resource Optimization*, 17 FCC Rcd 252, FCC 01-362 (rel. December 28, 2001) (“*Third NRO Order*”) at ¶¶ 48-49.

10. On or about October 22, 2015, Comporium's request was denied because Comporium had not met the MTE and/or Utilization criterion now set forth in the INC Guidelines. Comporium's request was denied despite the fact that Comporium does not have adequate numbering resources needed to satisfy this customer's demands for numbering resources in the Fort Mill rate center. The denial is shown on the last four pages of the online Application attached as Exhibit A. There is one denial for each of the thousands-blocks requested.

11. Comporium's inability to provide this important customer with the requested numbering resources prevents Comporium from providing the quality of service this customer desires, needs and expects. If Comporium is not assigned the numbering resources needed to meet the customer's request, Comporium will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources." *Second NRO Order* at ¶ 61.

12. The FCC's rules and orders, as well as the INC Guidelines, provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources. *See* 47 C.F.R. § 52.15(g)(4); Third NRO Order at ¶¶ 61-66, Central Office Code (NXX) Assignment Guidelines § 13.0.

13. Under the FCC's rules, NANPA must withhold numbering resources if a carrier has not met the numbering resource application requirements established in the rules. *See* 47 C.F.R. § 52.15(g)(3)(iv). However, the FCC's rules provide that a state

regulatory commission may overturn such a decision if the state commission determines “that the carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies.” 47 C.F.R. § 52.15(g)(4). The FCC has determined that states may grant relief “if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.” *Third NRO Order* at ¶ 64. In addition, the FCC has ruled that states “may grant requests for customers seeking contiguous block of numbers.” *Id.*

14. Comporium has demonstrated a verifiable need for the additional numbering resources requested. Comporium cannot provide telecommunications services of the customers’ choice without the requested numbering resources, as detailed herein. Furthermore, Comporium has exhausted all other available remedies, including requesting additional numbering resources from NANPA and/or the PA.

15. Comporium requests that the Commission reverse the decision to withhold numbering resources from Comporium because that decision interferes with Comporium’s ability to provide telecommunications services to its customers.

16. This Commission has previously recognized its jurisdiction and authority to review numbering denials and to order the release of numbering resources as required to meet customer needs. *See* Commission Order No. 2002-415 in Docket No. 2002-185-C (“Order Reversing NANPA Decision”).

WHEREFORE, Comporium requests that the Commission:

1. Reverse the decision to deny Comporium’s request for additional numbering resources;

2. Direct NANPA and/or the PA to provide the requested two thousands-blocks for the Fort Mill rate center; and
3. Grant the requested relief as soon as possible.

Respectfully submitted this 27th day of October, 2015.



M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
Telephone: (803) 799-9800

Attorneys for Fort Mill Telephone
Company d/b/a Comporium
Communications

Exhibit A

Thousands-Block Application

Thousands-Block Application Form - Part 1A

Tracking Number: **803-FORT**
MILL-SC-881316
Individual Block
Request

Type of Application: ☒ New ☐ Change ⁱ ☐ Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: **FORT MILL TELEPHONE CO.**
Headquarters Address: **330 East Black Street**
City, State, Zip: **Rock Hill, SC, 29730**
Contact Name: **James Montgomery, Jr**
Contact Address: **P. O. Box 470**
City, State, Zip: **Rock Hill, SC, 29731**
Phone: **803-326-6391** Fax: **803-326-6134** E-mail: **jamie.montgomery@comporium.com**

Pooling Administrator: ⁱⁱ

Contact Name: **John Auerbach**
Contact Address: **1800 Sutter St. Ste. 780**
City, State, Zip: **Concord, CA, 94520**
Phone: **925-363-8706** Fax: **925-363-7684**
E-mail: **john.auerbach@neustar.biz**

1.2 General Information:

Check one : No LRN needed _____ LRN needed ⁱⁱⁱ _____

NPA: 803 LATA: 422 OCN: ^{iv} 0521 Parent Company's OCN 0542

Number of Thousands-Blocks Requested : 2

Switch Identification (Switching Entity/POI) : ^v
RCHLSCXB32S

Rate Center: ^{vi} FORT MILL

1.3 Dates:

Date of Application: ^{vii} 10/22/2015

Requested Block Effective Date: ^{viii}
11/22/2015

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes _____ No X

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC) (LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment preference (Optional) _____
803-228-5 803-228-8

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
803-228-9

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) _____

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes, attach months to exhaust worksheet

☐ By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

☐ OCN: Intra-company ^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN: Inter-company ^x ☐ Effective Date

Change block : Yes _____ If Yes, list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated: Yes _____ or No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC: Yes _____ or No _____
- d) Has this block been protected from further assignment: Yes _____ or No _____

Disconnect block : Yes _____ If Yes, list NPA-NXX-X _____

Remarks: **Customer is requesting 1,600 consecutive numbers for a new facility in the Fort Mill Area. We do not have that many consecutive resources available.**

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066 available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

James Montgomery, Jr

Engineering Associate II

10/22/2015

Signature of Block Applicant

Title

Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the iconectivTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by iconectiv Telecom Routing Administration (TRA). In

addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

ⁱ Identify the type of change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder

^{xi} LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba
iconectiv

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 803-FORT MILL-SC-881316Date: Thursday, October 22,
2015OCN: 0521Company Name: FORT MILL TELEPHONE
CO.Rate Center: FORT MILLList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 803-396 803-547 803-548 803-578
803-578-1 803-578-2 803-578-3 803-578-4 803-578-5 803-578-6 803-578-8 803-578-9 803-802
803-835Name of Block Applicant: James Montgomery,
JrSignature: James Montgomery, JrTitle: Engineering Associate II
803-326-6134Telephone No.: 803-326-6391-

FAX No.:

E-Mail: jamie.montgomery@comporium.comA. Available Numbers: 13131B. Assigned Numbers: 44869C. Total Numbering Resources: 58000D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded
from the Utilization calculation ³: 0List
Excluded
Code(s) or
Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	

E. Growth
History -
Previous 6 months⁴

	<u>-215</u>	<u>-317</u>	<u>-81</u>	<u>-156</u>	<u>-266</u>	<u>-256</u>
--	-------------	-------------	------------	-------------	-------------	-------------

F. Forecast
- Next 12 months⁵

	<u>-215</u>	<u>-215</u>	<u>1600</u>	<u>-215</u>	<u>-215</u>	<u>-215</u>	<u>-215</u>	<u>-215</u>	<u>-215</u>	<u>-215</u>	<u>-215</u>
--	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):87.5

H. Months
to
Exhaust⁶ =

	<u>Numbers Available for Assignment to Customers(A)</u>
	<u>Average Monthly Forecast(G)</u>

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	13131	150.069
2	14131	161.497

I.
Utilization⁷

<u>Assigned Numbers(B)</u>	X 100 =	<u>77.36</u>
----------------------------	---------	--------------

=

Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation: Customer is requesting 1,600 consecutive numbers for a new facility in the Fort Mill Area. We do not have that many consecutive resources available.

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Report on all resources for the requested geographic area, including newly acquired blocks/codes.

³Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

⁴Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 803-FORT MILL-SC-881316

Date of Application: 10/22/2015 Effective Date: _____
Date of Receipt: 10/22/2015 Date of Response: 10/22/2015

Service Provider Name: FORT MILL TELEPHONE CO.
(iconectivTM LERGTM Routing Guide) OCN: 0521
Parent Company OCN: 0542

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

John Auerbach Phone: 925-363-8706
Signature of Pooling Administrator
John Auerbach Fax: 925-363-7684
Name (print)
Email: john.auerbach@neustar.biz

 NPA-NXX or
NPA-NXX-X :

Block Assigned: _____
Block Reserved : _____
Block Reservation
Expiration Date : _____
Block/Code
Modified : _____
Block/Code
Disconnected : _____

Block Contaminated(Yes or No) : _____
If Yes,enter the number of TNs contaminated : _____

Switch Identification(Switch Entity/POI): ¹ RCHLSCXB32S
Rate Center: FORT MILL

X Form Complete, request denied.
Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

_____ Request withdrawn.

Explanation:

_____ Assignment activity suspended by the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : **803-FORT MILL-SC-
881316**

Date of Application: **10/22/2015** Effective Date: _____
Date of Receipt: **10/22/2015** Date of Response: **10/22/2015**

Service Provider Name: **FORT MILL TELEPHONE CO.**
(iconectiv™ LERG™
Routing Guide) OCN: **0521**
Parent Company OCN: **0542**

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

John Auerbach Phone: **925-363-8706**
Signature of Pooling Administrator
John Auerbach Fax: **925-363-7684**
Name (print)
Email: **john.auerbach@neustar.biz**

NPA-NXX or
NPA-NXX-X : _____ Block Assigned: _____
Block Reserved : _____
Block Reservation
Expiration Date : _____
Block/Code
Modified : _____
Block/Code
Disconnected : _____
Block Contaminated(Yes or No) : _____
If Yes,enter the number of TNs contaminated : _____
Switch Identification(Switch Entity/POI): ¹ **RCHLSCXB32S**
Rate Center: **FORT MILL**

X Form Complete, request denied.
Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)

Exhibit B

Customer Request

Corporate Center Five
3735 Glen Lake Drive Charlotte, NC 28208
P: 800.357.5274
F: 800.640.5221



October 7, 2015

Greg Lunsford
External Affairs
Comporium
803-326-7170
Greg.lunsford@comporium.com

Dear Greg,

Please submit an Allocation request on behalf of Lash Group – AmerisourceBergen to provide a block of 2000 DID numbers to accommodate a new facility that will be located in Fort Mill SC. The property address will be 1420 Hwy 160, Fort Mill SC.

Need – This is a brand new facility in the Fort Mill service area. The new numbers are needed for current and future expansion.

Preference - We request that the 2000 numbers be non-consecutive and ask that the range fall somewhere between 1000 and 8999. It would be most preferred that the range be 5000-5999 and 8000-8999 block.

Restriction – Please avoid 0000 and 9000 number ranges.

Thank you for your help.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Hull". The signature is fluid and cursive, with the first name "Tom" and last name "Hull" clearly distinguishable.

Tom Hull
AmerisourceBergen
Manager, Telecommunications
3735 GlenLake Dr
Charlotte NC 28208
Phone: 704-248-3079
Fax: 704-357-0036
Tom.hull@lashgroup.com